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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CORINNE SOLOMON, an individual, Plaintiff, vs. BRETT JACOBSON, an individual; LOTTO LOTTO GAMZ ETC., INC., a Delaware corporation; DOES 1 through 25, inclusive, Defendants.	Case No. 2:15-cv-01453-VAP-JPR **PLAINTIFF CORINNE SOLOMON'S NOTICE OF MOTION FOR TERMINATING SANCTIONS AGAINST DEFENDANT BRETT JACOBSON [FRCP 37(2)(A)(vi)]** [Filed Concurrently Herewith: Points and Authorities; Van Ackeren Declaration; Solomon Declaration; [Proposed] Judgment] Judge: Hon. Virginia A. Phillips Date: April 4, 2016 Time: 2:00 p.m. Crtrm.: 2

TO DEFENDANTS BRETT JACOBSON AND LOTTO LOTTO GAMZ ETC., INC.:

PLEASE TAKE NOTICE THAT on April 4, 2016, at 2:00 p.m., or as soon thereafter as this matter may be heard by the above-entitled Court, located at 3470 Twelfth Street, Riverside, California 92501-3801, Plaintiff Corinne Solomon ("Solomon") will move the Court for terminating sanctions and entry of default judgment against Defendant Brett Jacobson ("Jacobson") in the amount of $45,000 plus prejudgment interest and punitive damages. Solomon makes this Motion on the ground that Jacobson has willfully disobeyed the Order Granting Plaintiff's Motion to Compel issued by the Hon. Jean P. Rosenbluth, Magistrate Judge on February 16, 2016 (Dkt. 32). Fed. R. Civ. P. 37(2)(A)(vi).

The Motion is based on this Notice, the Memorandum of Points and Authorities filed concurrently herewith, the Declarations of John D. Van Ackeren and Corinne Solomon filed concurrently herewith, and the pleadings, files, and other matters that may be presented at the hearing.

DATED: March 2, 2016

Respectfully submitted,
FREEMAN, FREEMAN & SMILEY, LLP

By: *\/s/ John D. Van Ackeren*
STEVEN E. YOUNG
JOHN D. VAN ACKEREN
Attorneys for Plaintiff CORINNE SOLOMON

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Orange, State of California. My business address is 1920 Main Street, Suite 1050, Irvine, California 92614.

On March 2, 2016, I served true copies of the following document(s) described as **PLAINTIFF CORINNE SOLOMON'S NOTICE OF MOTION FOR TERMINATING SANCTIONS AGAINST DEFENDANT BRETT JACOBSON [FRCP 37(2)(A)(vi)]** on the interested parties in this action as follows:

Brett Jacobson brett@mylottolotto.com	In Pro Per and as the Registered Agent for Defendant Lotto Lotto Gamz Etc., Inc.

BY E-MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from e-mail address john.vanackeren@ffslaw.com to the persons at the e-mail addresses listed in the Service List. I sent this transmission at approximately 3:30 p.m. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on March 2, 2016, at Irvine, California.

/s/ John D. Van Ackeren
John D. Van Ackeren

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